REMARKS

The Examiner is thanked for the careful examination of the application. In view of the foregoing amendments and the remarks that follow, the Examiner is respectfully requested to reconsider and withdraw the outstanding rejection.

Claims 6-8 and 15-17 are rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 4,627,707 to Tani et al., hereinafter *Tani*, in view of U.S. Patent No. 6,043,823 to Kodaira et al., hereinafter *Kodaira*.

The Examiner is thanked for indicating that Claims 1-5, 9-14 and 18-22 are allowed. Thus, Claim 6-8 and 15-17 are the only claims at issue, with Claims 6 and 15 being independent.

As presently recited, a conversion means of Claim 6 converts the first caption group and the second caption group into a third caption group so that a character string in the first caption group and a character string in the second caption group are different from each other. Similarly, a conversion unit of Claim 15 converts the first caption group and the second caption group into a third caption group so that a character string in the first caption group differs from a character string in the second caption group. After conversion, since the character string which was in the first caption group and the character string which was in the second caption group are different, each character string identifies a different drawing. Namely, Claims 6 and 15 define that character strings that are different from each other are identified after conversion. Claims 6 and 15 do not define rearrangement of character strings to avoid positional overlap.

The Examiner alleges that *Tani* discloses rearrangement of documents so that areas of documents do not overlap. However, this rearrangement is only to

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avoid positional overlap. Avoiding the positional overlap disclosed by Tani is

different from converting character strings to identify different drawings of Claims 6

and 15 of the present invention.

Tani does not disclose anything about converting the contents of documents

to identify different drawings.

In addition, though Kodaira discloses document data having at least one

drawing. Kodaira does not disclose converting the contents of documents to identify

different drawings.

Since both Tani and Kadaira do not disclose the conversion means of Claim 6

and 15, Claims 6 and 15 are patentable over Tani in view of Kodaira.

Claim 7, 8, 16 and 17 are dependent from Claims 6 and 15 respectively.

Thus, dependent Claims 7, 8, 16 and 17 are also patentable over Tani in view of

Kodaira for at least the same reasons as Claims 6 and 15.

Accordingly, the Examiner is respectfully requested to reconsider and

withdraw the outstanding rejection. In the event that there are any questions

concerning this response, or the application in general, the Examiner is respectfully

urged to telephone the undersigned attorney so that prosecution of the application

may be expedited.

Respectfully submitted,

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